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Attorney for Adam Pacheco

6 UNITED STATES DISTRICT COURT

7 DISTRICT OF NEVADA

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 vs.

12 ADAM PACHECO,

13 Defendant.

14 CASE NO. 2:19-CR-00248-RFB-DJA

15 MOTION TO APPOINT CO-COUNSEL

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17 COMES NOW MICHAEL J. MICELI, ESQ., and hereby moves this Honorable Court
18 for an Order granting his request to appoint Mr. CHARLES GOODWIN as co-counsel for Mr.
19 Pacheco. The nature and complexity of this case and the looming trial date are such that the
20 interests of justice require appointment of co-counsel and Mr. Goodwin is well suited to serve
21 that role.

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1 This Motion is based upon the *Guide to Judicial Policies and Procedures*, Vol. 7, Ch 2 §
2 230.53.20(b), approval from the *Standing Committee of Judges* and the attached memorandum
3 of points and authorities, the pleadings and papers on file herein, and any argument to be
4 entertained.

5 Dated: 17th day of June 2025.
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7 Respectfully submitted,

8 /s/ Michael J. Miceli, Esq.
9 MICHAEL J. MICELI, ESQ.
10 ATTORNEY FOR DEFENDANT
11 ADAM PACHECO

12 **MEMORANDUM OF POINTS AND AUTHORITIES**

13 **A. BACKGROUND INFORMATION**

14 This is a two-defendant trial spanning a fourteen count Superseding Criminal Indictment.
15 (ECF No. 108). The undersigned counsel was appointed as counsel for Mr. Pacheco on
16 May 20, 2024. (ECF No. 224). Since that time, approximately terabyte of discovery has
17 been produced thus far. Counsel must wade through this voluminous amount of discovery to
18 investigate and prepare for trial. Attorney Miceli is the 3rd attorney appointed to this case.

19 It is likely that this case will go to trial and if so, presumably the government will be
20 represented by two attorneys in addition to support staff. Mr. Pacheco should likewise have
21 the benefit at trial of two defense attorneys given the nature and complexity of the case. Mr.
22 Pacheco is a defendant that needs extra attention and needs to discuss all of his concerns and
23 issues about his case. Mr. Pacheco is out on pretrial release at this time.

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B. APPOINTMENT OF CO-COUNSEL

This case warrants the appointment of co-counsel due to the complex nature of the case and the voluminous discovery provided thus far. *See Guide to Judicial Policies and Procedures*, Vol. 7, Ch 2 § 230.53.20(b). It appears to involve a substantial amount of discovery, a terabyte having been provided thus far. And lastly, this case is currently set for trial for October 20, 2025. (ECF No. 243). Given the volume and complexity of discovery and the looming trial date this case warrants the appointment of co-counsel.

The defense's preferred co-counsel, Mr. Charles Goodwin, is a member of the CJA panel. Mr. Goodwin is capable, well-qualified, and willing to assume co-counsel duties in this case.

For all these reasons, the defense respectfully asks that the Court enter an order appointing Mr. Goodwin as co-counsel for Mr. Pacheco, *Nunc Pro Tunc: June 16, 2025*.

DATED this 17th day of June 2025.

/s/ Michael J. Miceili, Esq.

MICHAEL J. MICELI, ESQ.

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Attorney for Adam Pacheco

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of Motion to Appoint Co-Counsel, was served upon all parties and counsel of record through the Court's CM/ECF filing system.

DATED this 17th day of June 2025.

/s/ Michael J. Miceili, Esq.

MICHAEL J. MICELI, ESQ.

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Attorney for Adam Pacheco

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

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4 UNITED STATES OF AMERICA,
5 Plaintiff,

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8 ADAM PACHECO,
9 Defendant.
10

CASE NO. 2:19-CR-00248-RFB-DJA

11 ORDER APPOINTING CO-COUNSEL

12 Counsel for defendant ADAM PACHECO has moved for an order appointing co-counsel
13 in this case for trial preparation and trial. The Motion seeking appointment of co-counsel explains
14 the nature of the case, the difficulties it presents, and how, as a result, appointing co-counsel is
15 necessary in the interest of justice. Proposed co-counsel is Charles Goodwin, a member of the
16 CJA Panel.

17 As required by Volume 7, Ch. 2 § 230.53.20 of the Guide to Judiciary Policies and
18 Procedures, the Court finds that the appointment of an additional attorney in this difficult case is
19 necessary and in the interests of justice.

20 GOOD CAUSE APPEARING, it is hereby ORDERED that the Clerk of the Court shall
21 notify the CJA appointing authority for the District of Nevada of the appointment of attorney
22 Charles Goodwin as co-counsel for defendant Adam Pacheco. Because Mr. Goodwin is a member
23 of the CJA Panel, he will be compensated at the hourly rate authorized for CJA appointments.
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25 Counsel shall be appointed *Nunc Pro Tunc*: June 16, 2025.
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1 IT IS SO ORDERED GOOD CASEU APPEARING, and because Mr. Charles Goodwin
2 is willing to assume co-counsel duties in this case, its here by ORDERED that the Clerk of the
3 Court shall notify the CJA appointing authority for the District of Nevada of the appointment of
4 attorney Charles Goodwin as co-counsel for defendant Adam Pacheco.

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6 Dated this 17 day of June 2025.

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8 UNITED STATES DISTRICT JUDGE

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